



Comments on Section 1115 Waiver

p. 24 Current Health Care Workforce and Projected Need

Non-physician positions should list and include Applied Behavior Analysis (ABA) therapists, psychologists, and child development professionals.

p. 25 Health Care Workforce Loan Repayment

Health care workforce should list and include Applied Behavior Analysis (ABA) therapists, psychologists, and child development professionals.

p. 29-30 Workforce Planning and Evaluation

Scope should include Applied Behavior Analysis (ABA) therapists, psychologists, and child development professionals.

p. 32 Administrative Simplification- Universal Assessment

What tools are being examined for use in developing the UAT?

For example, the Supports Intensity Scale (SIS) is the most reliable and validated tool for measuring medical, behavioral, and programmatic needs for children and adults with developmental disabilities. It is currently being used in 22 states.

UAT should be administered by impartial interviewers, non-service providers, perhaps an ISSA model. Those administering the UAT should be trained to assure reproducibility and reliability of results.

Workgroup for UAT should be expanded to include representation of service organizations and other stakeholders.

p. 35 Expanded Service Array

Also critical for inclusion is transition services for young adults moving from children's community residential to CILA. To better align with federal goals, this should include vocational assessments, work trials, and post-educational vocational plans prior to any placement in day habilitation programs.

p. 35 Reduce Waitlist for Individuals with Developmental Disabilities

Will the new criteria to reduce the backlog in PUNS account for non-emergency needs for services?

p. 47 Approach to Evaluation

We believe language should be added to include a central acquisition point for data and comparative data available to measure outcomes for HCBS providers.

What outcomes are wanted by Illinois for HCBS providers? What is expected in the system of care?

Appendix X

p. 56 Community-Based Day Habilitation

Included in the therapy services (OT, PT, Speech) should be applied behavior analysis, therapy and counseling services.

p. 57 Facility-Based Day Habilitation

Behavioral intervention should be included in the list of services (ABA), as well as therapy and counseling services.

p. 68 Supported Employment

The requirement for Supported Employment programs to provide transportation to the employment site should be reflected in the rates to provide this requirement.

p. 69 Supported Employment

Annual rate should be aligned with that of programs funded under section 110 of the Rehabilitation Act of 1973 and should provide for a minimum of 4 hours per day based on individualized assessment and placement. Combination of day programs should not exceed total of 8 hours per day

p. 72 Behavior Intervention and Treatment

Does not specify who provides the services and should list and include Board Certified Behavior Analysts (BCBAs).

Limiting the amount of behavior intervention and treatment to 66 hours per year is inconsistent with person-centered planning and disregards the level of need for some individuals.

General Comments

The current waiver draft primarily references adult services, but as a child serving agency, we would like to see more specificity for children's services. We are willing and look forward to the opportunity, to work with the departments as the discussions continue and implementation moves forward.